

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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| In re: | PROMESA TITLE III | RECEIVED & FILED 2020 JAN 14 PM 1:15 CLERK'S OFFICE U.S. DISTRICT COURT SAN JUAN, PR |
| THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO | NO. 17 BK 3283-LTS | |
| as representative of | (Jointly Administered) | |
| THE COMMONWEALTH OF PUERTO RICO, et al., | This filing relates to the "Ninety-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment or Services Provided" | |
| Debtors | Number of claim- 9837 | |

MOTION IN OPPOSITION TO "NINETY-SEVENTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO DEFICIENT CLAIMS ASSERTING INTERESTS BASED ON SALARY DEMANDS, EMPLOYMENT OR SERVICES PROVIDED" AND FOR EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW, MARGARITA CLEMENTE TAPIA, pro se, and very respectfully states and prays to his Honorable Court as follows:

1- Recently I received a document titled "Ninety-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of

Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment or Services Provided”, requesting additional information on my claim.

2- In compliance with said Objection, I hereby state as follows:

- a- My name is Margarita Clemente Tapia
- b- My address is HC 3 Box 22922, Río Grande, PR 00745-8868
- c- I do not have an email address
- d- number of my claim - 9837 for \$32,000

3- I am including with this motion a certification of the Government of Puerto Rico, Department of Transportation and Public Works, that states that I was an employee from June 9, 1971, until January 31, 2007, when I retired.

4- I was a party to the case Jeannette Abrams Díaz v. Commonwealth of Puerto Rico, civil no. K AC2005-5021, in the Commonwealth of Puerto Rico, Court of First instance, San Juan Part. On said case, a judgment was issued that granted me \$32,000, which is the basis for my claim.

5- I requested a copy of said judgment on January 10, 2020, to be filed with this Court as evidence of my claim. Nonetheless, the file of the Commonwealth case is in a warehouse and it will take approximately two weeks to obtain a copy of said judgment.

6- Hence, I request an extension of time of 15 days, that is, until January 29, 2020 to file a copy of said judgment.

WHEREFORE, the appearing party respectfully request that the Court be informed of the above and grant an extension of time of 15 days, until January 29, 2020, to file a copy of the judgment of the Commonwealth's case.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY: that on this same date I notified via regular mail a copy of this document to the following: Counsel for the Oversight Board (Martin Bienestock, Brian S. Rosen), Proskauer Rose LLP, Eleven Times Square, New York, NY, 10036-8299; Counsel for the Creditors' Committee (Luc A. Despins, James Bliss, James Worthington, G. Alexander Bongarts), Paul Hastings, LLP, 200 Park Avenue, New York, NY 10166.

In San Juan, Puerto Rico, this 14th day of January, 2020.



Margarita Clemente Tapia

Claim: 9837